

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CRIMINAL NO. 11-CR-30108-DRH
	)	
RICHARD J. KLEMIS,	)	
	)	
Defendant.	)	

**NOTICE OF EXPERT WITNESS**

The United States of America, by and through Stephen R. Wigginton, United States Attorney for the Southern District of Illinois, and Robert L. Garrison, Assistant United States Attorney, hereby gives notice to the defense of its intent to call an expert witness in its case-in-chief at trial. The witness' name, opinion, the basis and the reasons therefor, and the witness' qualifications are set forth as follows:

1. Dr. Jeffery S. Shafer, M.D.

Dr. Shafer will testify as both a fact witness and an expert witness. As a fact witness, Dr. Shafer will testify that he was the treating physician when Tyler P. McKinney arrived via ambulance at Belleville Memorial Hospital on February 23, 2011. He will further testify that he administered medical treatment to McKinney in an attempt to save him, but that McKinney could not be revived.

As an expert witness in the field of medicine, Dr. Shafer is expected to give his opinion that Tyler McKinney's cause of death was opiate intoxication and overdose. Dr. Shafer will base his opinion on his examination and observations of Tyler McKinney; on McKinney's medical records generated by Belleville Memorial Hospital on February 23, 2011 and shortly thereafter; and on his years of training and experience as a medical doctor.

Dr. Schaffer's qualifications and professional experience are set forth in Exhibit 6 hereto, and incorporated by reference. Tyler McKinney's medical records from Belleville Memorial Hospital have been previously delivered to the defense as part of discovery in this case.

2. In the event it becomes necessary for the Government to call additional expert witnesses, an additional notice will be sent.

Respectfully submitted,

STEPHEN R. WIGGINTON  
United States Attorney

*s/ Robert L. Garrison*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 16, 2014, I caused to be electronically filed NOTICE OF EXPERT WITNESS with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

William D. Stiehl, Jr.

Respectfully submitted,

STEPHEN R. WIGGINTON  
United States Attorney

s/ Robert L. Garrison  
ROBERT L. GARRISON  
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